

THE HONORABLE BRIAN D. LYNCH
CHAPTER 13
LOCATION: Tacoma, Washington

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT TACOMA

In re:

PENNY L TIBBITS,

Debtor.

Case No.: 23-40850-BDL

DECLARATION OF TRACY MAHER IN
SUPPORT OF OBJECTION TO
CONFIRMATION

I, Tracy Maher hereby declare that the following statements are true and correct to the best of my knowledge, and I am subject to penalty of perjury under the laws of the United States:

1. I am over the age of eighteen, a resident of the United States of America, and otherwise competent to provide the following testimony from my personal knowledge.
2. I am employed by Michael G. Malaier, Chapter 13 Trustee charged with administering the instant bankruptcy estate.
3. According to our records, Debtor has failed to make all payments as required by the plan.
4. Trustee estimates that the total amount necessary to repay the secured, priority, unsecured, and administrative debt over the maximum sixty month period is

1 approximately \$146,289.74. Funds committed to the plan over sixty months total
2 \$143,699.40. Therefore the plan is underfunded in the amount of approximately
3 \$2,590.34.

- 4 5. I will provide any further information required by the Court to assist in its adjudication of
5 the issues presented in the Objection to Confirmation.

6 **EXECUTED** at Tacoma, Washington this 30th day of June, 2023.

7
8
9 /s/Tracy Maher
10 Tracy Maher, Office Manager for
Michael G. Malaier, Chapter 13 Standing Trustee